

Plaintiff in Pro Per  
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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

TODD MICHAEL SCHULTZ

Case No. 2:23-cv-03452-JAK-MRWx

Plaintiff,

v.

MICHAEL C. THOMPSON  
GREGORY R. HOLMES  
YOUTUBE LLC

# MEMO TO OPPOSE YOUTUBE LLC'S OBJECTIONS TO PLAINTIFF TODD MICHAEL SCHULTZ'S REQUEST FOR ADMISSION

## Defendants

1) Plaintiff contends that the “discovery” yielded in an RFA is not “discovery” in the spirit of the law, which is overseen by a magistrate judge. This is personal information, inter-party discovery which is encouraged at the outset.

2) Plaintiff contends that they must answer the questions to Plaintiff, who may not lodge the answers with the court until proper “discovery” begins under Honorable Judge Wilner.

1                   3) Plaintiff believes this is the case and that YouTube LLC is obstructing  
2 any possible way for Plaintiff to understand any of their actions and so their  
3 dismissal must be very unlikely and very well founded by legal theory and case  
4 law, which it currently is not. (See MEMO TO OPPOSE DISMISSAL BY  
5 YOUTUBE by PLAINTIFF).

6                   4) Thus, YouTube LLC should answer the RFA in full, per State Law.  
7 This is not the seeking of “discovery” which is determined by Judge Wilner.  
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11                   Dated August 14, 2023

12                   Signed By

13                   Todd Michael Schultz

14                   In Pro Per

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